UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF ILLINOIS (ST. LOUIS)

JESSE WARD

Plaintiff,

Docket No. 3:18-cv-01734-NJR-MAB

- against -

CONSEQUENCE HOLDINGS, LLC

Defendant.

## PLAINTIFF'S MOTION TO WITHDRAW MOTION TO SET INSTALLMENT PAYMENT PLAN

Plaintiff Jesse Ward ("Plaintiff"), via counsel, respectfully moves the Court to withdraw and terminate his motion to set a one-year installment payment plan at Docket #42.

On June 8, 2020, the Court set a response deadline for the motion of June 22, 2020 [Dkt. #43]. Defendant Consequence Holdings, LLC ("Defendant") has not yet filed a response.

As good faith grounds for the present motion to withdraw, Plaintiff's counsel, Richard Liebowitz, has certified on the record [Dkt. #45] that, as of June 15, 2020, all monetary obligations imposed on Mr. Liebowitz and the Liebowitz Law Firm, PLLC (collectively "LLF") by the Court's order dated May 7, 2020 [Dkt. #39] have been paid. The amount of \$10,000 has been paid to the Clerk of Court, as reflected on the docket, plus \$10,000 has been paid to Defendant.

Dated: June 15, 2020

Valley Stream, NY

Respectfully submitted:

/s/richardliebowitz/

Richard Liebowitz LIEBOWITZ LAW FIRM, PLLC 11 Sunrise Plaza, Suite 305 Valley Stream, NY 11580 516-233-1660 RL@LiebowitzLawFirm.com

Attorneys for Plaintiff Jesse Ward

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing motion was served on June 15, 2020 via CM/ECF on all counsel of record, including Dan Booth, Esq.

/s/richardliebowitz/